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**AT&T UMBRELLA BENEFIT PLAN NO. 1**  
**(Specially Appearing for purpose of Stipulation only)**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO/OAKLAND DIVISION**

KATHLEEN VERA,  
Plaintiff,  
v.  
AT&T UMBRELLA BENEFIT PLAN NO. 1  
Defendant.

) Case No.: 3:14-cv-161 WHO  
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)  
**STIPULATION AND**  
**ORDER CONTINUING CASE**  
**MANAGEMENT CONFERENCE AND**  
**RELATED DEADLINES**  
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)  
Complaint filed: 1/10/14  
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## STIPULATION

Pursuant to United States District Court for the Northern District of California Local Rule 6.2 and Federal Rule of Civil Procedure, Rule 6, Plaintiff KATHLEEN VERA (“Plaintiff”) and Defendant AT&T UMBRELLA BENEFIT PLAN NO. 1, which is Specially Appearing for the purpose of this Stipulation only (“Defendant”), by and through their undersigned attorneys, hereby stipulate and agree as follows:

WHEREAS, pursuant to the Court's Case Management Scheduling Order filed January 21, 2014, the Court set the Case Management Conference for April 15, 2014 in the above-referenced Action (see Court Docket No. 8);

WHEREAS, on March 11, 2014, the Clerk issued a Notice Rescheduling the Case Management Conference to April 14, 2014 (see Court Docket No. 10);

WHEREAS, on April 8, 2014, the Clerk issued a Notice Rescheduling the Case Management Conference to May 23, 2014, as well as the due date for the parties' Case Management Conference Statement to May 13, 2014 (see Court Docket No. 13);

WHEREAS, on March 31, 2014 Plaintiff sent Defendant via U.S. Mail a Notice Of A Lawsuit And Request To Waive Service Of A Summons;

WHEREAS, Defendant has 30 days from March 31, 2014, or until April 30, 2014, to return the executed Waiver of Service of Summons to Plaintiff's counsel;

WHEREAS, Defendant executed and returned the Waiver of Service of Summons to Plaintiff's counsel on April 30, 2014;

WHEREAS, on May 5, 2014 the parties filed a Joint Stipulation and Proposed Order requesting that the Case Management Conference be moved to July 15, 2014 with the Case Management Conference Statement due on July 1, 2014;

1 WHEREAS, on May 13, 2014, this case was reassigned from Magistrate Judge Elizabeth  
2 D. Laporte to Judge William H. Orrick (see Court Docket No. 19):

3 WHEREAS, on May 15, 2014, Judge Orrick issued a Case Management Conference  
4 Order (see Court Docket. No. 20), setting the Case Management Conference for May 27, 2014  
5 and requesting that any stipulation requesting a continuance of the Case Management  
6 Conference be filed no later than ten days before the May 27, 2014 Case Management  
7 Conference;

8 WHEREAS, Defendant has 60 days from March 31, 2014, or until May 30, 2014, to  
9 appear in this case and respond to Plaintiff's Complaint, which is a week after the current date  
10 set for the Case Management Conference;

11 WHEREAS, the case is not yet at issue;

12 WHEREAS, this Stipulation does not in any way constitute a responsive pleading by  
13 Defendant or a General Appearance by Defendant, and Defendant reserves any and all arguments  
14 to be made in connection with such responsive pleading and General Appearance;

15 WHEREAS, in her Case Management Conference Statement filed on April 7, 2014  
16 (Court Docket 12) Plaintiff requested that the Case Management Conference be rescheduled as  
17 Plaintiff had just served the Notice Of A Lawsuit And Request To Waive Service Of A  
18 Summons form on March 31, 2014 on Defendant, as described above;

19 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between  
20 Plaintiff and Defendant, by and through their respective undersigned attorneys of record, that the  
21 Case Management Conference be continued to July 15, 2014, 2014, at 2:00 p.m., or as soon  
22 thereafter as ordered by the Court, and extend the related deadline for filing of the Case  
23 Management Conference Statement to July 1, 2014.  
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1 Good cause exists for the continuation of the Case Management Conference date and  
2 extending the related date for filing the Case Management Conference Statement, as set forth  
3 above.

4 **IT IS SO STIPULATED.**

5  
6 Dated: May16, 2014

BOLT KEENLEY KIM LLP

7  
8 By: /s/ Brian H. Kim  
9 Brian H. Kim  
10 Attorneys for Plaintiff  
11 KATHLEEN VERA

12 Dated: May 16, 2014

MILLER LAW GROUP  
13 A Professional Corporation

14  
15 By: /s/ Jennifer A. Shy  
16 Jennifer A. Shy  
17 Attorneys for Defendant  
18 AT&T UMBRELLA BENEFIT PLAN  
19 NO. 1 Specially Appearing for  
purposes of Stipulation only)

20  
21 **PROPOSED ORDER**

22 Having reviewed the Stipulation executed by Plaintiff KATHLEEN VERA and  
23 Defendant AT&T UMBRELLA BENEFIT PLAN NO. 1, and good cause appearing, the Court  
24 hereby orders that the May 27, 2014 Case Management Conference be continued to July 17,  
25 2014, at 10:30 a.m., and that the Case Management Conference Statement be filed by July 10,  
26 2014.

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**IT IS SO ORDERED.**

Dated: May 19, 2014



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The Honorable William H. Orrick  
United States District Judge